

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NEW YORK MARINE AND GENERAL  
INSURANCE COMPANY,

*Plaintiff,*

-against-

MILLENNIA ASSURANCE, INC.,

*Defendant.*

Case Number: 1:23-cv-07528

**NOTICE OF MOTION**

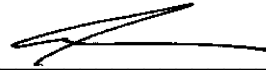
**PLEASE TAKE NOTICE** that, upon the Affidavit of Ralph Tsour dated October 6, 2023; upon the accompanying Memorandum of Law in Support of defendant Millennia Assurance, Inc.’s (“Millennia” or “Defendant”) Motion to Dismiss dated October 6, 2023; and upon all the pleadings and prior proceedings had herein, Defendant will move this Court, before the Honorable Colleen McMahon, at the United States District Court, Southern District of New York, 500 Pearl Street, Courtroom 24A, New York, NY 10007, for an order:

- (a) Dismissing plaintiff New York Marine and General Insurance Company’s (“Plaintiff”) Complaint against the Defendant with prejudice; and
- (b) Granting as such other and further relief as the Court deems just and proper.

Dated: Kew Gardens, New York  
October 6, 2023

**LIPSIUS-BENHAIM LAW, LLP**  
*Attorneys for Defendant Millennia  
Assurance Inc.*

By: \_\_\_\_\_



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